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Attorneys for Defendant KATHERINE HERRERA

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

UNITED STATES OF AMERICA,	:	Case No. 2:20-mj-0089 EFB
	:	
Plaintiff,	:	MOTION AND (PROPOSED) ORDER
	:	TO FILE UNDER SEAL
vs.	:	DEFENDANT'S RESPONSE TO
	:	GOVERNMENT'S REQUEST FOR
KATHERINE HERRERA,	:	PRETRIAL DETENTION
	:	
Defendant.	:	Date: Wednesday
	:	June 10, 2020
	:	Time: 2:00 pm
	:	Court: Honorable Magistrate
	:	Judge Edmund F. Brennan
	:	

DEFENDANT KATHERINE HERRERA, by and through counsel, hereby  
submits his Motion and (Proposed) Order to File Under Seal  
Defendant's Response to Government's Request for Pretrial Detention  
and all Exhibits attached thereto.

Respectfully submitted,  
June 10, 2020

  
JAMES T. REILLY, Attorney at Law  
California State Bar No. 67254  
Counsel for Defendant KATHERINE HERRERA

MOTION AND (PROPOSED) ORDER TO FILE UNDER SEAL  
DEFENDANT'S RESPONSE TO GOVERNMENT'S REQUEST FOR PRETRIAL DETENTION

**MOTION TO FILE UNDER SEAL DEFENDANT'S RESPONSE  
TO GOVERNMENT'S REQUEST FOR PRETRIAL DETENTION**

The Defendant's Response to Government's Request for Pretrial Detention and the Exhibits thereto contain confidential medical information regarding Defendant Katherine Herrera.

Miss Herrera therefore respectfully requests that her response and the attached exhibits be filed under seal.

Counsel for Miss Herrera, via email, has served on government counsel, Assistant U.S. Attorney Mira Chernick, copies of the Defendant's Response, the Exhibits thereto and this motion to file under seal.

Respectfully submitted,




JAMES T. REILLY, Attorney at Law  
Counsel for Defendant KATHERINE HERRERA

**(PROPOSED) ORDER GRANTING MOTION TO FILE UNDER SEAL  
DEFENDANT'S RESPONSE TO GOVERNMENT'S REQUEST FOR PRETRIAL DETENTION**

Defendant's Motion to File Under Seal Defendant's Response to Government's Request for Pretrial Detention having been considered by the court and good cause appearing therefor, the motion is granted and the Response and attached Exhibits are to be filed under seal.

IT IS SO ORDERED.

DATED: June 10, 2020



The Honorable Edmund F. Brennan  
Magistrate Judge, U.S. District Court  
Eastern District of California, Sacramento